

1 Pamela M. Egan, WSBA No. 54736 (*pro hac vice*)

2 CKR Law LLP

3 506 2nd Avenue, 14th Floor

4 Seattle, WA 98114

5 Telephone: (415) 297-0132

6 Facsimile: (206) 582-5001

7 Email: pegan@ckrlaw.com

8 *Attorneys for Mark D. Waldron, Chapter 11 Trustee*

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12 **UNITED STATES BANKRUPTCY COURT**
13 **EASTERN DISTRICT OF WASHINGTON**

14 In re:

15 GIGA WATT, Inc., a Washington
16 corporation,

17 Debtor.

18 Case No. 18-03197 FPC 11

19 Chapter 11

20 **NOTICE OF CHAPTER 11**
21 **TRUSTEE'S MOTION FOR ORDER**
22 **APPROVING MOSES LAKE**
23 **THREE-WAY AGREEMENT**

24 **PLEASE TAKE NOTICE** that Mark D. Waldron, in his official capacity
25 as the Chapter 11 Trustee (the “Trustee”), has moved (the “Motion”) the Court
1 pursuant to 11 U.S.C. §§ 363 and 365 and Fed. R Bankr. Proc. 9019 for an Order
2 approving the *Agreement to Withdraw Motion for Relief from Stay Motion, for Re-*
3 *Entry of Subtenant Eco-Diversified Holdings, Inc. and for Release of Claim*
4 *Premises* (the “Moses Lake Three-Way Agreement”).

5 **PLEASE TAKE FURTHER NOTICE** that pursuant to the Motion, the
6 Trustee requests the Court’s approval of the Moses Lake Three-Way Agreement
7 pursuant to which the Trustee is re-opening a portion of the Debtor’s operations,

8 Notice of Chapter 11 Trustee’s Motion
9 for Order Approving Agreement, etc. - Page 1

1 nearly doubling the rent owed by the Debtor's subtenant, Eco-Diversified
2 Holdings, Inc. ("EDH"), obtaining the withdrawal with prejudice of EDH's claim
3 in the approximate amount of \$25 million, and entering into a revenue-sharing
4 agreement with the Moses Lake Landlords until administrative liabilities to the
5 Moses Lake Landlords are brought current.

6 **PLEASE TAKE FURTHER NOTICE** that the Motion and its supporting
7 papers and exhibits may be obtained from the Clerk of the above-captioned Court.

8 **PLEASE TAKE FURTHER NOTICE** that if you oppose the Motion,
9 then **within twenty-four day (24) days from the date of service by mail of this**
10 **Notice that is set forth below**, you must file your written response with the Court
11 Clerk, U.S. Bankruptcy Court, E.D. WA, 904 West Riverside Ave., Suite 304,
12 Spokane, WA 99201 or, if by mail, the Court Clerk, U.S. Bankruptcy Court, E.D.
13 WA, P.O. Box 2164, Spokane, WA 99210-2164 and serve a copy upon (1)
14 undersigned counsel at CKR Law LLP, 506 Second Ave., 14th Floor, Seattle, WA
15 98114 and (2) James Perkins, Office of The United States Trustee, 920 West
16 Riverside Avenue, Suite 593, Spokane, WA 99201-1012.

17 **PLEASE TAKE FURTHER NOTICE** that the Court may enter an order
18 without actual hearing or further notice unless a written objection is timely served
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1 and filed. If an objection is timely served and filed, you will receive notice of the
2 date and time of a hearing on your objection.

3 **DATE OF SERVICE BY MAIL: APRIL 17, 2019**

4 Dated: April 16, 2019 CKR LAW LLP

5 By: /s/ Pamela M. Egan
6 Pamela M. Egan (WSBA No. 54736)

7 *Attorneys for Mark D. Waldron, Chapter 11
Trustee*

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